

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
FY2013 DRINKING WATER ANNUAL RESOURCE DEPLOYMENT PLAN (ARDP)  
State Fiscal Year 2013 (July 1, 2012 to June 30, 2013)**

[Click here to go the table of contents \(by placing cursor over the link and pressing down the "Ctrl" key while clicking the left mouse button\).](#)

Not all state Public Water System Supervision (PWSS) programs have access to enough resources to implement all of the provisions of existing drinking water regulations, and other primacy program requirements. Therefore, we need to plan for circumstances where resources are inadequate to implement the entire drinking water protection program. Since the purpose of the Safe Drinking Water Act (SDWA) is to protect public health, federal and state agencies have an obligation to ensure that limited resources are deployed in a way that ensures maximum health protection benefit, and that we collectively keep track of what is and is not being done as we strive for full implementation.

The plan documents what will and will not be done during the year. The agreement reflects state capacity based on available resources, as well as local health protection priorities. Core activities, such as explaining regulation requirements to public water supplies, and tracking and reporting violations, are fundamental to the integrity of the public health protection program and are not amenable to priority setting. U.S. EPA will participate and support state implementation efforts where appropriate and possible. U.S. EPA commitments in support of state programs are listed in the table.

The state and U.S. EPA will both report annually on their accomplishments so we can jointly appraise our effectiveness, and our progress toward implementing the complete program. Where resource shortfalls continue to exist, the state and EPA will simultaneously continue efforts to obtain additional resources in order to fill the resource gap. State and EPA efforts to obtain additional resources necessary to fill the gaps associated with temporarily disinvested activities will be documented in the end-of-year evaluation reports.

Using this resource deployment plan as a framework for annual planning and progress assessment should meet several objectives:

- (1) Promote clear understanding of both state and U.S. EPA commitments.
- (2) Minimize ad hoc requests for program reporting.
- (3) Promote judicious use of limited resources to achieve the best possible public health protection.
- (4) Support efforts to increase resources by clearly identifying resource and program constraints.
- (5) Promote collaborative inter-agency program planning and implementation.

**PUBLIC WATER SYSTEM SUPERVISION PROGRAM  
CORE STATE ACTIVITIES**

⇒ Provide an adequate laboratory certification program for all regulated contaminants. This does not mean that states must expand their labs to perform all the analyses. At a minimum,

a state should have an adequate certification program to certify commercial labs within the state.

- ⇒ Maintain a data management system that tracks requirements for all rules. This means to have the appropriate combination of hardware, software and personnel to accurately and within a reasonable timeframe identify the inventories (including routine updates of system information), maintain water quality monitoring information, and track compliance with all M/R, MCL, MRDL, TT, PN and public information requirements.
- ⇒ Keep adequate records of pertinent state decisions.
- ⇒ Adopt all rules in a timely manner (within two year extension period).
- ⇒ Notify all systems of regulatory requirements and respond to questions.
- ⇒ Determine violations for all rules and report to U.S. EPA.<sup>1</sup>
- ⇒ Maintain an adequate enforcement and compliance assistance program (adequacy determined by a decrease in violation frequency).
- ⇒ Maintain a baseline core of individuals with the technical expertise needed, to perform sanitary surveys, plan and spec reviews, and respond to emergencies.
- ⇒ To improve our ability to understand, measure, assess, and communicate progress, conduct a joint evaluation of program performance with EPA.
- ⇒ Develop and implement a plan to provide adequate funding to carry out all functions of the PWSS program.

<sup>1</sup> States must report actions and sample data quarterly and inventory data at least annually in accordance with 40 C.F.R. 140.15. These data must be reported in XML format and utilize the Central Data Exchange (CDX) as the media for data transfer to U.S. EPA. The reporting schedule for States to the national database, SDWIS/FED-ODS, is as follows: FFYQ1 – February 15, FFYQ2 – May 15, FFYQ3 – August 15, and FFYQ4 – November 15. If the data is not reported within 60 days, the Region will raise the issue to the State Director's attention.

### ***CORE R5 ACTIVITIES***

- ⇒ Respond to questions from our state programs about regulations. Train state staff about regulations by offering in-state and/or regional training opportunities.
- ⇒ Maintain a forum for U.S. EPA and state communications through the monthly U.S. EPA and state conference calls, holding an annual meeting, and conducting additional meetings/calls as needed.
- ⇒ Determine whether primacy applications are completed, track primacy submittal/review for all rules, and provide comments on draft rules, as requested.
- ⇒ Communicate and track reporting required for new rules by state.

⇒ Assist states in acquiring resources to carry out all functions of the PWSS program.

⇒ Monitor specific regulations related to state follow-up to the findings of the last data and enforcement verification reports, as indicated in the “R5 Activities” column.

Acronyms/Abbreviations	
<p>ACS – Annual Commitment System          ARDP – Annual Resource Deployment Plan          CCR – Consumer Confidence Report          C.F.R. – Code of Federal Regulations          CPE – Comprehensive Performance Evaluation          CTA – Comprehensive Technical Assistance          CWS – Community Water System          DBP – Disinfection By-Products          D/DBPR – Disinfectants and Disinfection By-Products Rule          DWSRF – Drinking Water State Revolving Fund          eDV – Electronic Data Verification (Tool)          ERG – Expense Reimbursement Grant          ERP – Enforcement Response Policy          ETT – ERP Enforcement Targeting Tool          FBRR – Filter Backwash Recycling Rule          GWR – Ground Water Rule          GWS – Ground Water System          GUDI – Ground Water under the Direct Influence of Surface Water          IESWTR – Interim Enhanced Surface Water Treatment Rule          IOC – Inorganic Contaminant          LCR – Lead and Copper Rule          LT1ESWTR – Long-Term 1 Enhanced Surface Water Treatment Rule          LT2ESWTR – Long-Term 2 Enhanced Surface Water Treatment Rule          MCL – Maximum Contaminant Level          M/R – Monitoring/Reporting          MRDL – Maximum Residual Disinfectant Level</p>	<p>MRDL – Maximum Residual Disinfectant Level          NCWS – Non-Community Water System          NPDWR – National Primary Drinking Water Regulation          NPDWR CDVRT – Compliance Determination and Violation/Enforcement Reporting Tool          NTNCWS – Non-Transient Non-Community Water System          OCCT – Optimal Corrosion Control Treatment          PN – Public Notification          PWS – Public Water System          PWSID – Public Water System Identification          PWSS – Public Water System Supervision          SDWA – Safe Drinking Water Act          SDWIS/FED – Safe Drinking Water Information System/Federal          SDWIS/State – Safe Drinking Water Information System/State          SOC – Synthetic Organic Contaminant          SOX – “SOX” is a code in SDWIS/FED that indicates the state entered a return to compliance for a violation          SPM – U.S. EPA Region 5 Ground Water and Drinking Water Branch State Program Manager          Stage 2 – The Stage 2 Disinfectants and Disinfection By-Products Rule          SWI – Sustainable Water Infrastructure          SWP – Source Water Protection          SWTR – Surface Water Treatment Rule          TCR – Total Coliform Rule          TMDL – Total Maximum Daily Load          TT – Treatment Technique          VOC – Volatile Organic Contaminant</p>

## Annual Resource Deployment Plan Table of Contents

*NOTE: You can go directly to any of these sections by moving your cursor over one of the activities below and pressing and holding the “Ctrl” key while clicking the left mouse button. You can click the “click here to go back to the table of contents” links throughout the document to return to this page.*

<b>Table 1. Primacy Activities .....</b>	<b>5</b>
<b>1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR .....</b>	<b>5</b>
<b>2.0 – Total Coliform Rule .....</b>	<b>10</b>
<b>3.0 – Ground Water Rule .....</b>	<b>13</b>
<b>4.0 – Nitrate and Nitrite.....</b>	<b>17</b>
<b>5.0 – Lead and Copper.....</b>	<b>20</b>
<b>6.0 – D/DBPRs .....</b>	<b>23</b>
<b>7.0 – IOCs (including Arsenic).....</b>	<b>26</b>
<b>8.0 – Radionuclides (including Radon) .....</b>	<b>27</b>
<b>9.0 – SOCs.....</b>	<b>28</b>
<b>10.0 – VOCs .....</b>	<b>30</b>
<b>11.0 – Organic and Inorganic Chemical Monitoring Waiver Program.....</b>	<b>31</b>
<b>12.0 – Sodium .....</b>	<b>31</b>
<b>13.0 – Public Notification .....</b>	<b>32</b>
<b>14.0 – CCR.....</b>	<b>34</b>
<b>15.0 – Laboratory Certification .....</b>	<b>36</b>
<b>16.0 – Compliance and Enforcement Management .....</b>	<b>38</b>
<b>17.0 – Data Management and Reporting .....</b>	<b>41</b>
<b>18.0 – Annual Compliance Report .....</b>	<b>44</b>
<b>19.0 – Conduct Joint Assessment of Program Progress Using Evaluation Tools such as U.S. EPA’s Strategic Plan and State/U.S. EPA Shared Goals.....</b>	<b>45</b>
<b>Table 2. Other Activities.....</b>	<b>46</b>
<b>1.0 – Preparing for Security Threats at PWSs .....</b>	<b>46</b>
<b>2.0 – Operator Certification .....</b>	<b>47</b>
<b>3.0 – Capacity Development.....</b>	<b>50</b>
<b>4.0 – Source Water Assessments and Protection .....</b>	<b>51</b>
<b>5.0 – Conduct Joint Assessment of Program Progress Using the PWSS Program Implementation Report.....</b>	<b>56</b>
<b>Table 3. National and Regional EPA Priorities.....</b>	<b>57</b>
<b>1.0 – Sustainable Infrastructure .....</b>	<b>57</b>
<b>2.0 – Environmental Justice .....</b>	<b>58</b>
<b>Attachment A: Linking the Strategic Plan to this Work Plan.....</b>	<b>59</b>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR</b>			
1.1 – Submit primacy revisions as necessary.  <a href="#"><i>Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</i></a>	IDEM has interim primacy for the IESWTR and FBR.  Primacy for LT1ESWTR was granted July 2007.  LT2ESWTR became effective in Indiana on June 6, 2010.  Primacy application for LT2ESWTR was submitted to EPA R5 in May 2011.	Respond to questions about surface water treatment rules.  Process primacy applications. Track progress. Provide status updates, when requested.	IDEM is working on requested revisions to the rule as requested by EPA during the Primacy review. These changes will be included with our rulemaking on the Revised Total Coliform Rule.  R5 EOY: R5 awaits receipt of these rules.
1.2 – Notify all surface water and GUDI systems of their LT2 regulatory requirements.	EPA R5 has provided notification to the systems. IDEM DWB has provided on-site training for all affected PWS. Training for the affected LT2 system is complete. Systems are up to date on the submittal of early implementation requirements.	As requested, promote understanding of surface water treatment regulations by conducting presentations at state water industry organization functions.	We will continue to do individualized training on systems if the need arises.  Ongoing activity, meeting commitment.  R5 EOY: R5 finds this approach to be satisfactory.
1.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the Surface Water Treatment Rules.	IDEM-DWB utilizes SDWIS to track all requirements of the rules including violations and enforcement. The IESWTR and the LT1ESWTR rules were tracked using SDWIS since 1/2005.		Ongoing activity, meeting commitment.  R5 EOY: Indiana is commended for keeping its data reporting systems up-to-date, thereby facilitating accurate and timely data transfer.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR</b>			
1.4 – Electronically report all TT, M/R, and PN violations and inventory updates to SDWIS/FED for all surface water systems.	Violations and enforcement actions will be reported to SDWIS/FED quarterly via SDWIS/State migration software.	► R5 will evaluate extent to which LT2 violations are reported to SDWIS/FED. As of October 2013, there were no LT2 TT violations and no LT2 M/R violations in SDWIS/Fed.	Ongoing activity, meeting commitment.  R5 EOY: Indiana is commended for meeting all commitments for submitting and correcting data during SFY 13.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR</b>			
<p>1.5 – Conduct and report sanitary surveys at surface water (40 C.F.R. Part 141 Subpart H) systems. A completed sanitary survey means the date a sanitary survey visit was conducted in which all eight sanitary survey components have been addressed per 142.16(b)(3)(i). If a sanitary survey takes multiple days or visits to complete, only the latest date or last visit is expected to be reported for the final visit date that completes the eight components of a sanitary survey.</p> <p>Consider using sanitary surveys to evaluate and document status and progress of Source Water Protection (SWP) and Sustainable Water Infrastructure (SWI) activities (see section 4.0 of the “other activities” table and section 1.0 of the “national and regional EPA priorities” table below, respectively).</p>	<p>DWB will prioritize the completion of sanitary surveys for subpart H systems at a frequency of 3 years or less. Sanitary surveys are reported to SDWIS.</p> <p>IDEM is experiencing a large turnover of inspectors. We have been able to fill most positions when they become vacant, but we are typically short-staffed because of the turnover rate. Training new inspectors is proving to be difficult and time consuming. Adequate training and vacancies are issues that will hamper our ability to perform sanitary surveys. It will be very difficult to able to perform surveys at a frequency specified in rule. Surveys at surface water systems will be a high priority.</p>	<p>Provide training, as requested.</p> <p>R5 will measure completeness of sanitary surveys within evaluation time period (three or five years).</p> <p>R5 to track progress related to state and EPA efforts to obtain additional resources necessary to enable Indiana to complete all sanitary surveys on schedule.</p>	<p>Due to turnover of inspectors and training of new staff 11 SW or SWP just outside of the 3 year schedule. 9 were completed within 30 days of the anniversary of the last sanitary survey the other 3 within 60 days of last survey. Of those 12, 1 was surface water plant and the survey was completed within 4 days of the anniversary of the last survey, the remaining 10 were surface water purchase systems.</p> <p>R5 EOY: Based on an October 2013 query if community surface water systems conducted during the 2011-2013 time period. IDEM completed surveys at 87 (75.34%) of the systems and did not complete surveys at 28 (24.15%). Similarly, for community groundwater systems, 517 (75.92%) were completed while 164 (24.08%) were not. For NTNCWS (GW), the completed/non completed ratio was 528 (98.32%) to 9 (1.68%), and at TNCWS (GW) the ratio was 2,067 (82.32%) to 444 (17.68%).</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR</b>			
1.6 – Ensure that all surface water and GUDI systems that notify the State that they recycle spent filter backwash water, thickener supernatant, or liquids from dewatering processes, return these flows through the processes of a system’s existing conventional or direct filtration system, or at alternate location approved by the State.	DWB approves and tracks all requirements of FBR for all surface water systems.		Compliance with the filter backwash rule is checked as part of sanitary surveys.  R5 EOY: Not verified in 2013.
1.7 – Use sanitary surveys, CPEs, other inspections, or other activities to evaluate recycled backwash water practices when they occur at surface water and GUDI systems. When those practices are not in compliance with the FBRR require the system to modify the practices to achieve compliance.	Sanitary surveys will evaluate backwash practices and note any deficiencies found during inspections. Follow-up activities will be conducted to ensure that deficiencies are addressed. Enforcement actions will be initiated if necessary.		Compliance with the filter backwash rule is checked as part of sanitary surveys.  R5 EOY: Not verified in 2013.
1.8 – Ensure that filter/disinfection practices are adequate to achieve inactivation/removal requirements for regulated microbial contaminants found in surface water sources.	Sanitary surveys will note any deficiencies found during inspections. Follow-up activities will be conducted to ensure that deficiencies are addressed. Enforcement actions will be initiated if necessary.		Ongoing activity, meeting commitment.  R5 EOY: Not verified in 2013.
1.9 – Follow-up on turbidity TT and individual filter turbidity M/R violations. <b>a.</b>	This is routinely done. Violation letters will be issued to PWSs if there is any violation, and Field	Region 5 will assist as necessary, or as requested.	Ongoing activity, meeting commitment.



Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR</b>			
Track individual filter turbidity trigger exceedances. <b>b.</b> Track completion of individual filter turbidity profiles for systems exceeding individual filter triggering criteria.	Inspectors will make follow-up visits providing technical assistance. PWSs with individual filter TT violations are identified monthly, issued a violation letter and the PWS is required to perform a filter profile. Once the filter profile is submitted, it is reviewed in accordance with the rule requirement.		R5 EOY: Not verified in 2013. No assistance was needed or requested.
1.10 – When required by rule: (a) track the completion of CPE/CTA for PWSs and (b) ensure that disinfection profiling and benchmarking is conducted.	If any PWS is required to perform a CPE/CTA, the final report will be reviewed to ensure that the solutions are completed and will return the PWS to compliance. A field visit will be made if necessary.		No CPE/CTA was done in this FY. R5 EOY: Not verified in 2013.
1.11 – Ensure that a residual disinfectant concentration is measured according to rule requirements.	Disinfectant residual results are submitted for review for both SWTR and DBPR requirements.		Ongoing activity, meeting commitment. R5 EOY: Not verified in 2013.
1.12 – Follow-up on disinfection residual TT and M/R violations.	This activity is routinely done. Violation letters will be issued to PWSs and Field Inspectors make follow-up visits providing technical assistance if necessary. Any violation of the monitoring and reporting requirements will be issued a violation letter followed by appropriate Field Inspection or other contact.	Region 5 will assist as necessary, or as requested	Ongoing activity, meeting commitment. R5 EOY: Not verified in 2013. No assistance was needed or requested.

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR</b>			
1.13 – Report treatment data (e.g., treatment codes for all surface water, GUDI, and purchased GUDI sources, seller's PWSID number for purchased surface water and purchased GUDI sources, etc.)	<p>This data will continue to be reported to SDWIS as information is obtained.</p> <p>Treatment data continues to be incorporated into SDWIS.</p>		<p>Ongoing activity, meeting commitment. Treatment and distribution information is now being updated in SDWIS from each sanitary survey.</p> <p>R5 EOY: Indiana is commended for meeting all commitments for submitting and correcting data during SFY 13.</p>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>2.0 – Total Coliform Rule</b>			
<p>2.1 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information) and violations for the TCR.</p> <p><a href="#">Click here to go back to the table of contents (by pressing and holding the "Ctrl" key while clicking the left mouse button).</a></p>	All PWSs were notified of regulatory requirements. When new rules are adopted, IDEM will duly notify each PWS of the new requirements.		<p>IDEM fully utilized the SDWIS TCR NCD module for compliance daily.</p> <p>R5 EOY: Indiana is commended for keeping its data reporting systems up-to-date, thereby facilitating accurate and timely data transfer.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>2.0 – Total Coliform Rule</b>			
2.2 – Electronically report all TCR MCL, M/R and PN violations and inventory updates to SDWIS/FED for all public water systems.	Currently, all violations, enforcement and inventory updates for TCR are reported to SDWIS quarterly.	<p>R5 will evaluate the extent to which TCR violations are reported late to SDWIS/FED.</p> <p>Monitor TCR-related State follow-up to the findings of the last data verification report, namely:</p> <p>Ensure systems monitor correctly and assign/report violations to SDWIS/FED.</p> <p>Ensure that M/R violations are assigned for sample results that are received late.</p> <p>Ensure field staff document the basis for waiver of five samples the following month and that reasons are tracked in SDWIS.</p> <p>Provide additional TCR rule training for field and compliance staff.</p>	<p>Ongoing activity, meeting commitment.</p> <p>R5 EOY: Indiana is commended for meeting all commitments for submitting and correcting data during SFY 13.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>2.0 – Total Coliform Rule</b>			
2.3 – Follow-up on all MCL and M/R violations and determine a proper course of action to ensure public health protection.	After an MCL violation, a letter is sent to the PWS in violation. Field Inspectors are given copies of the letters. Follow-up calls or on-site visits by the Field Staff will be performed. The follow-up to determine the adequacy of the systems' action will depend on the type of system and population served and the availability of resources at IDEM.	Region 5 will assist as necessary, or as requested.  R5 to track progress related to state and EPA efforts to obtain additional resources necessary to enable Indiana to follow up on all MCL and M/R violations and determine a proper course of action to ensure public health protection.	Routinely done, commitment being met. This is a high priority for Field staff. They were able to call or visit all systems to follow-up on MCL violations.  R5 EOY: R5 did not verify this activity in SFY 13. No assistance was requested. R5 understands State limitations related to obtaining additional resources.
2.4 – Ensure sanitary surveys are conducted periodically that, at a minimum, meet frequency requirements specified by rule.  Consider using sanitary surveys to evaluate and document status and progress of SWP and SWI activities (see section 4.0 of the “other activities” table and section 1.0 of the “national and regional EPA priorities” table below, respectively).	Surveys will be conducted to attempt to meet the minimum frequencies*. Inspection information is being entered and tracked in SDWIS  * IDEM is experiencing a large turnover of inspectors. We have been able to fill most positions when they become vacant, but we are typically short-staffed because of the turnover rate. Training new inspectors is proving to be difficult and time consuming. Adequate training and vacancies are issues that will hamper our ability to perform sanitary surveys. It will be very difficult to able to perform surveys at a frequency specified in rule. We will prioritize routine surveys at CWS, NTNCWS and problem systems.	R5 to track progress related to state and EPA efforts to obtain additional resources necessary to enable Indiana to ensure sanitary surveys conducted meet rule frequency requirements.	With the high turnover in staff and training time for new staff, it proved to be a challenge to get surveys completed. The majority of systems were less than 30 days past the anniversary date of the last survey. We are currently unable to fill positions and we will remain challenged in meeting this activity in the future.  R5 EOY: R5 understands State limitations related to obtaining additional resources.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>3.0 – Ground Water Rule</b>			
3.1 – Submit primacy revisions as necessary.  <a href="#">Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</a>	The Ground Water Rule became effective in Indiana on June 6, 2010.  The primacy application for the GWR was received by EPA on May 9, 2011.	R5 will complete its review of the IDEM primacy application and announce a stringency determination.	IDEM is working on requested revisions to the rule as requested by EPA during the Primacy review. These changes will be included with our rulemaking on the Revised Total Coliform Rule.  R5EOY: R5 is awaits receipt of this rule.
3.2 – Notify all public water systems of their GWR regulatory requirements	All PWSs were notified of regulatory requirements.	As requested, promote understanding of the GWR by conducting presentations at state water industry organization functions after promulgation.	Complete.  R5 EOY: R5 has not verified whether or not all systems were notified. No presentations were conducted in 2013.
3.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the GWR.	The GWR data base is maintained using SDWIS/State. IDEM has upgraded to SDWIS 3.01 that includes all elements of GWR for tracking compliance since Nov. 2011.	Region 5 commits to communicate any issues our states have with limited SDWIS/State rule tracking functionality to HQ via the national GWR workgroup.	IDEM fully utilized the SDWIS TCR NCD module with GWR capability for compliance daily.  R5 EOY: Indiana is commended for keeping its data reporting systems up-to-date, thereby facilitating accurate and timely data transfer.
3.4 – Electronically report all TT, M/R and PN violations and inventory updates to SDWIS/FED for all public water systems.	All violations, enforcement and inventory updates for GWR will be reported to SDWIS quarterly.	► R5 will evaluate extent to which GWR violations are reported to SDWIS/FED. <sup>1</sup> As of October 2013, Indiana had reported 7 TT, 222 M/R, and 4 other violations.	Ongoing activity, meeting commitment.  R5 EOY: Indiana is commended for meeting all commitments for submitting and correcting data during SFY 13.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>3.0 – Ground Water Rule</b>			
<p>3.5 – Conduct and report sanitary surveys that meet requirements by 12/31/12 at CWSs and then every 3 years thereafter, and by 12/31/14 at NCWSs served by a groundwater source and then every 5 years thereafter. A completed sanitary survey means the date a sanitary survey visit was conducted in which all eight sanitary survey components have been addressed per 142.16(b)(3)(i). If a sanitary survey takes multiple days or visits to complete, only the latest date or last visit is expected to be reported for the final visit date that completes the eight components of a sanitary survey.</p> <p>Consider using sanitary surveys to evaluate and document status and progress of SWP and SWI activities (see section 4.0 of the “other activities” table and section 1.0 of the “national and regional EPA priorities” table below, respectively).</p>	<p>Sanitary Surveys will be conducted at a frequency that meets the requirements by 12/31/2012 for CWSs and by 12/31/2014 for NCWSs served by groundwater sources and then every 5 years thereafter*.</p> <p>Sanitary Survey will be reported to SDWIS regularly.</p> <p>* IDEM was fortunate to be able to fill several vacant positions that perform sanitary surveys, but not all vacancies have been filled. We have several new inspectors and adequate training is an issue that may also hamper our ability to perform sanitary surveys. We may not be able to perform surveys at a frequency specified in rule.</p>	<p>► R5 will measure completeness of sanitary surveys within the evaluation time period (three or five years).</p> <p>R5 to track progress related to state and EPA efforts to obtain additional resources necessary to enable Indiana to ensure sanitary surveys conducted meet rule frequency requirements.</p>	<p>With the high turnover in staff and training time for new staff, it proved to be a challenge to get surveys completed. The majority of systems were less than 30 days past the anniversary date of the last survey. We are currently unable to fill positions and we will remain challenged in meeting this activity in the future.</p> <p>R5 EOY: R5 understands State limitations related to obtaining additional resources.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>3.0 – Ground Water Rule</b>			
3.6 – Ensure that GWSs that must treat to the 4-log virus removal/inactivation standard conduct compliance monitoring to demonstrate treatment effectiveness.	GWSs that must treat to the 4-log virus removal/inactivation standard were issued an approval letter requiring the system to have chlorine residual monitoring device for continuous testing or grab sampling on small systems (3300 population or less). Systems are required to submit monthly reports of operation ensuring that the required minimum residual is met daily.		Ongoing activity, meeting commitment.  R5 EOY: R5 has not verified whether or not GWSs that treat to the 4-log virus removal/inactivation standard conduct compliance monitoring to demonstrate treatment effectiveness.
3.7 – Determine appropriate corrective actions in consultation with GWSs that collect fecal indicator-positive source water sample(s) or that have significant deficiencies.	GWSs that have fecal indicator-positive source water samples are required to collect 5 additional samples within 24 hours. If any of the results is fecal positive, the system will be required to either: provide treatment (to be on compliance schedule), find other source, provide bottle water, or, on cases found during sanitary survey, to remove any potential sources of contaminants.		Ongoing activity, meeting commitment.  R5 EOY: R5 did not verify this requirement in 2013.
3.8 – Determine if optional source water monitoring will be used. If so, apply monitoring requirements to selected systems.	Optional source water monitoring will be used if there's history of violation Otherwise, see 3.7 above.		Ongoing activity, meeting commitment.  R5 EOY: R5 did not verify this requirement in 2013.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>3.0 – Ground Water Rule</b>			
3.9 – Follow-up on, and return to compliance: (a) corrective action consultation and reporting violations, (b) TT violations, (c) M/R violations, (d) public notification violations, and (e) other discovered recordkeeping/reporting violations.	<p>Corrective actions outside of sanitary survey deficiencies are handled through formal enforcement actions.</p> <p>All M/R violations are issued a violation letter after the end of the reporting period.</p> <p>Follow up on systems that failed to issue a PN will be prioritized based on available resources.</p> <p>All discovered recordkeeping/reporting violations are issued violation letter after the end of the reporting period.</p>	R5 to track progress related to state and EPA efforts to obtain additional resources necessary to enable Indiana to follow up on systems that failed to issue a PN.	<p>Ongoing activity, meeting commitment.</p> <p>R5 EOY: R5 did not verify this requirement in 2013</p>



Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>4.0 – Nitrate and Nitrite</b>			
<p>4.1 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and tracks nitrate/nitrite violations.</p> <p><a href="#"><u>Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</u></a></p>	Nitrate/nitrite compliance is tracked using SDWIS/State.		<p>IDEM fully utilized the SDWIS CDS module for daily compliance with the nitrate/nitrite rule.</p> <p>R5 EOY: Indiana is commended for keeping its data reporting systems up-to-date, thereby facilitating accurate and timely data transfer.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>4.0 – Nitrate and Nitrite</b>			
4.3 – Electronically report all MCL, M/R and PN violations and inventory updates to SDWIS/FED for all public water systems.	All violations, enforcement and inventory updates are reported to SDWIS quarterly.	R5 will evaluate the extent to which nitrate violations are reported late to SDWIS/FED.	<p>Ongoing activity, meeting commitment.</p> <p>R5 EOY: Indiana is commended for meeting all commitments for submitting and correcting data during SFY 13.</p> <p>The mosr recent R5 Enforcement Verification (EV), issued on 8/24/12 which covered a review in 2008 of 44 system files consisting of 15 community water systems, 13 nontransient noncommunity water systems, and 16 transient noncommunity water systems for the PN, TCR, LCR, Chemical Phase Rules (including Arsenic and Nitrate), Stage 1 DDBP and the CCR. The EV concluded that IDEM showed improved performance with processing PN violations, but processing Nitrate violations needed improvement. R5 found that IDEM was satisfactorily following its Compliance and Enforcement Strategy for PN, TCR, LCR, and Chemical Rules including Arsenic. IDEM was also found to be accurately reporting inventory data. IDEM is commended for developing and using SOPs for TCR, Nitrates, Stage 1 DDBP, and CCR.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>4.0 – Nitrate and Nitrite</b>			
4.4 – Follow-up on all MCL and M/R violations and determine a proper course of action to ensure public health protection.	<p>After an MCL violation, a letter is sent to the PWS in violation. Field Inspectors are given copies of the letters. Follow-up calls or on-site visits by the Field Staff will be performed. The follow-up to determine the adequacy of the systems' action will depend on the type of system and population served and the availability of resources at IDEM.</p> <p>All M/R violations are issued a violation letter after the end of the reporting period including day care and schools. SDWIS provides the necessary candidate violations and staff does the validation of all the violations.</p>	<p>Region 5 will assist as necessary, or as requested.</p> <p>R5 to track progress related to state and EPA efforts to obtain additional resources necessary to enable Indiana to follow up on all MCL and M/R violations and determine a proper course of action to ensure public health protection.</p>	<p>Ongoing activity, met commitment. Field Staff performed a site visit for all acute MCL violations. Technical assistance calls may be made to systems with MCLs for chronic contaminant violations and on-site visits were made when circumstances warranted it.</p> <p>R5 EOY: EPAs most recent enforcement verification (based on a 2008 site visit) determined that IDEM routinely followed up on MCL violations but follow up performance for M/R violations was mixed. No verification was performed in 2013.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>5.0 – Lead and Copper</b>			
5.1 – Submit primacy revisions as necessary  <a href="#"><u>Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</u></a>	Primacy application for LCRSTR was submitted to EPA R5 in May 2011. IDEM responded to EPA comments in January 2012. Rule revisions will occur sometime after January 2013.	Provide training for states on treatment changes that could affect lead levels (focus on chlorine and chloramines, in anticipation of Stage 2 compliance in 2012).	IDEM is working on requested revisions to the rule as requested by EPA during the Primacy review. These changes will be included with our rulemaking on the Revised Total Coliform Rule.  R5EOY: R5 is awaits receipt of this rule.
5.2 – Incorporate rule revisions into state oversight and enforcement operations.	LCRMR had been incorporated in IDEM’s compliance and enforcement tracking mechanisms.		Complete.  R5 EOY: The most recent Data Verification and Enforcement Verification concluded that IDEM’s performance is satisfactory.
5.3 – Notify all CWSs and NTNCWSs of their LCRSTR regulatory requirements	All public water systems are notified of their regulatory requirements.		Meeting commitment.  R5 EOY: The most recent Data Verification and Enforcement Verification concluded that IDEM’s performance is satisfactory.
5.4 – Maintain a data base management system that accurately tracks lead and copper action level exceedances (sample data), violations, and milestone data for CWSs and NTNCWSs.	LCR and the minor revisions are tracked using SDWIS.		LCR and LCRMR are tracked under the CDS module of SDWIS.  R5 EOY: Indiana is commended for keeping its data reporting systems up-to-date, thereby facilitating accurate and timely data transfer.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>5.0 – Lead and Copper</b>			
5.5 – Electronically report violation and milestone data to SDWIS/FED for all CWSs and NTNCWSs, lead and copper 90 <sup>th</sup> percentile action level sample data for all large and medium sized systems, and 90 <sup>th</sup> percentile action level exceedance sample data for small systems.	All violations, enforcement, and inventory updates are reported to SDWIS quarterly.	<p>► R5 will evaluate extent to which LCRSTR violations are reported to SDWIS/FED.<sup>1</sup> As of October 2013, Indiana had reported 62 LCRSTR M/R violations.</p> <p>R5 will finalize the LCR module of the NPDWR compliance determination and violation/enforcement reporting tool (CDVRT).</p> <p>Monitor LCR related State follow-up to the findings of the last data and enforcement verification report, which were:</p> <ol style="list-style-type: none"> <li>1. Ensure systems collect the proper number of samples based on population.</li> <li>2. Ensure that IDEM assigns violations if systems fail within the triennial monitoring period.</li> <li>3. Ensure IDEM reports violations to SDWIS/Fed when systems do not collect samples June thru Sept.</li> <li>4. Ensure that violations are reported as the first day after the end of the monitoring period.</li> </ol>	<p>Ongoing activity, meeting commitment.</p> <p>R5 EOY: Indiana is commended for meeting all commitments for submitting and correcting data during SFY 13.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>5.0 – Lead and Copper</b>			
5.6 – Designate OCCT and follow-up on OCCT installation violations at all required PWSs.	OCCT continues to be issued for PWSs. OCCT installation violations will be referred for formal enforcement. Schools and day care M/R violations are readily identified in the Agency database system. Monthly, quarterly, or semi-annual M/R update queries are made to identify M/R violations. Once M/R violations are identified, violation letters are sent.		Ongoing activity, meeting commitment.  R5 EOY: The most recent Data Verification and Enforcement Verification concluded that IDEM's performance is satisfactory.
5.7 – Follow-up on all M/R violations.	M/R violations are readily identified in the Agency database system. Monthly, quarterly, or semi-annual M/R update queries are made to identify M/R violations. Once M/R violations are identified violation letters are sent.	Region 5 will assist as necessary, or as requested.	Ongoing activity, meeting commitment.  R5 EOY: The most recent Data Verification and Enforcement Verification concluded that IDEM's performance is satisfactory.
5.8 – Set optimal water quality parameter ranges and/or minimum values for all CWSs and NTNCWSs where required by the LCR.	WQP ranges continue to be set for all PWSs that are required to optimize corrosion control.		Ongoing activity, meeting commitment.  R5 EOY: The most recent Data Verification and Enforcement Verification concluded that IDEM's performance is satisfactory.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>6.0 – D/DBPRs</b>			
<p>6.1 – Submit primacy revisions as necessary.</p> <p><a href="#"><u>Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</u></a></p>	<p>Stage1 D/DBPR primacy application was submitted to Region 5. IDEM has interim primacy for this rule.</p> <p>Stage 2 D/DBPR became effective in Indiana on June 6, 2010. Primacy application for Stage 2 D/DBPR was submitted to EPA R5 in May 2011.</p>	<p>Train state staff about Stage 2 D/DBPR by offering in-state and/or regional training opportunities. As noted in 5.1, provide training for states on treatment changes that could affect lead levels (focus on chlorine and chloramines, in anticipation of Stage 2 compliance in 2012).</p>	<p>IDEM is working on requested revisions to the rule as requested by EPA during the Primacy review. These changes will be included with our rulemaking on the Revised Total Coliform Rule.</p> <p>R5EOY: R5 is awaits receipt of this rule.</p>
<p>6.2 – Notify all CWSs and NTNCWSs (serving greater than 10,000 people) delivering water that has been treated with a primary or residual disinfectant (other than ultraviolet light) of their Stage 2 regulatory requirements.</p>	<p>All systems have been informed of their regulatory requirements.</p> <p>DWB Staff completed training for Stage2 DBP rules in mid-2008.</p>	<p>Region 5 will handle and close out all enforcement actions that we’ve initiated and will continue to take enforcement actions until at least the point of state rule adoption. Once the state has adopted the rule, Region 5 will be available to assist with any enforcement actions needed.</p>	<p>An additional set of trainings were done for all system sizes prior to the Stage 2 compliance monitoring start date for each Stage 2 schedule.</p> <p>R5 EOY: R5 has not verified whether or not all systems were notified.</p>
<p>6.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the D/DBP rule.</p>	<p>Stage 1 and 2 D/DBP rules compliance are tracked using SDWIS. The new D/DBP rule is tracked under the CDS module of SDWIS. To ensure accuracy of treatment and distribution information currently contained in SDWIS, data from sanitary surveys is checked against SDWIS and updated as necessary.</p>		<p>The new D/DBP rule is tracked under the CDS module of SDWIS. To ensure accuracy of treatment and distribution information currently contained in SDWIS, data from sanitary surveys is checked against SDWIS and updated as necessary.</p> <p>R5 EOY: Indiana is commended for keeping its data reporting systems up-to-date, thereby facilitating accurate and timely data transfer.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>6.0 – D/DBPRs</b>			
6.4 – Electronically report all MCL, M/R TT and PN violations and inventory updates to SDWIS/FED for all public water systems.	All violations, enforcement and inventory updates are reported to SDWIS quarterly.	<p>► R5 will evaluate extent to which Stage 2 violations are reported to SDWIS/FED. As of October 2013, IDEM had reported 3 Stage 2 M/R violations.</p> <p>Monitor D/DBPR related State follow-up to the findings of the last data and enforcement verification report, which were:</p> <ol style="list-style-type: none"> <li>1. Ensure that violations are reported to SDWIS/Fed if RAAs are not calculated.</li> <li>2. Ensure that chlorine residual samples are collected at the same time and place as TCR samples.</li> <li>3. If SDWIS/State is used to calculate compliance, ensure that State staff manually input the number of chlorine samples collected.</li> <li>4. Ensure that IDEM document why RAA values are appearing in SDWIS/State as “0” when chlorine residual values are greater than “0”.</li> <li>5. Ensure that IDEM reassess for disinfection profiling and benchmarking when treatment changes.</li> </ol>	<p>Ongoing activity, meeting commitment.</p> <p>R5 EOY: Indiana is commended for meeting all commitments for submitting and correcting data during SFY 13.</p>



Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>6.0 – D/DBPRs</b>			
6.5 – Follow-up on: (a) all MCL/MRDL violations, including chlorine dioxide MRDL violations; (b) all M/R violations; (c) all other reporting requirement violations.	When compliance staff identifies MRDL violations including chlorine dioxide MRDL violations, a violation letter will be issued to the system and the Field staff will be informed. Field staff will follow-up as necessary to help facilitate compliance.	Region 5 will assist as necessary, or as requested.	Ongoing activity, meeting commitment.  R5 EOY: The most recent Data Verification and Enforcement Verification concluded that IDEM's performance is satisfactory.
6.6 – Ensure that Subpart H systems using conventional filtration operate in compliance with the DBP precursor control treatment technique requirements.	A database for DBP precursor removal is maintained that accurately tracks the inventory (including routine updates of system information) and violations of the DBP precursor removal requirements.	Region 5 will assist as necessary, or as requested.	Ongoing activity, meeting commitment.  R5 EOY: The most recent Data Verification and Enforcement Verification concluded that IDEM's performance is satisfactory.
6.7 – Determine which systems do not qualify for reduced monitoring and inform them they must return to the routine monitoring frequency.	Determinations will be made and the systems will be informed.		Ongoing activity, meeting commitment.  R5 EOY: The most recent Data Verification and Enforcement Verification concluded that IDEM's performance is satisfactory.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>7.0 – IOCs (including Arsenic)</b>			
<p>7.1 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the IOCs.</p> <p><a href="#"><i>Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</i></a></p>	IOC compliance is tracked using SDWIS CDS module.		<p>IOCs are tracked under the CDS module of SDWIS.</p> <p>R5 EOY: Indiana is commended for keeping its data reporting systems up-to-date, thereby facilitating accurate and timely data transfer.</p>
7.2 – Electronically report all MCL, M/R and PN violations and inventory updates to SDWIS/FED for all CWSs and NTNCWSs.	All violations, enforcement and inventory updates are reported to SDWIS quarterly.	R5 will evaluate arsenic MCL non-compliance as reported in SDWIS/FED.	<p>Ongoing activity, meeting commitment.</p> <p>R5 EOY: Indiana is commended for meeting all commitments for submitting and correcting data during SFY 13.</p>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>7.0 – IOCs (including Arsenic)</b>			
7.3 – Follow-up on MCL and M/R violations and take an appropriate course of action that ensures public health protection.	All M/R violations are issued violation letter after the end of the reporting period. After an MCL violation, a letter is sent to the PWS in violation. Field Inspectors are given copies of the letters and a follow-up is made either by phone or on-site inspection. An immediate determination is made as to the adequacy of the system's action. If necessary, the system is directed to take additional steps to protect public health. Further contact is made by Compliance staff to ensure field follow-up has been made and that actions and samples have been recorded in SDWIS.	Region 5 will assist as necessary, or as requested.	Ongoing activity, meeting commitment.  R5 EOY: The most recent Data Verification and Enforcement Verification concluded that IDEM's performance is satisfactory.

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>8.0 – Radionuclides (including Radon)</b>			
8.1 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for radionuclides.  <a href="#"><u>Click here to go back to the table of contents (by pressing and holding the "Ctrl" key while clicking the left mouse button).</u></a>	Radionuclide rule compliance is tracked using the SDWIS module.		Radionuclides are tracked under the CDS module of SDWIS.  R5 EOY: Indiana is commended for keeping its data reporting systems up-to-date, thereby facilitating accurate and timely data transfer.

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>8.0 – Radionuclides (including Radon)</b>			
8.2 – Electronically report all MCL, M/R and PN violations and inventory updates to SDWIS/FED for all CWSs.	All violations, enforcement and inventory updates are reported to SDWIS quarterly.		Ongoing activity, meeting commitment.  R5 EOY: Indiana is commended for meeting all commitments for submitting and correcting data during SFY 13.
8.3 – Follow-up on MCL and M/R violations and take an appropriate course of action that ensures public health protection.	Process similar to 7.3 above.	Region 5 will assist as necessary, or as requested.	Ongoing activity, meeting commitment.  R5 EOY: The most recent Data Verification and Enforcement Verification concluded that IDEM's performance is satisfactory.

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>9.0 – SOC's</b>			
9.1 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the SOC's.  <a href="#"><i>Click here to go back to the table of contents (by pressing and holding the "Ctrl" key while clicking the left mouse button).</i></a>	SOC compliance is tracked using SDWIS.		SOCs are tracked under the CDS module of SDWIS.  R5 EOY: Indiana is commended for keeping its data reporting systems up-to-date, thereby facilitating accurate and timely data transfer.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>9.0 – SOC</b>			
9.2 – Electronically report all MCL, M/R and PN violations and inventory updates to SDWIS/FED for all CWSs and NTNCWSs.	All violations, enforcement and inventory updates are reported to SDWIS quarterly and tracked under the CDS module. To ensure accuracy of treatment and distribution information currently contained in SDWIS, data from sanitary surveys is checked against SDWIS and updated as necessary.	<p>Monitor State SOC related follow-up to the findings of the last data verification report, which were:</p> <ol style="list-style-type: none"> <li>1. Ensure that IDEM assigns violations when systems <math>\geq 3300</math> fail to collect 2 samples in a 12-month period following a 3 year compliance period.</li> <li>2. Ensure that IDEM assign M/R violations for missed chemical sampling (either routine or increased).</li> <li>3. Ensure that systems monitor for fluoride even if they do not fluoridate.</li> <li>4. Ensure that violations are assigned for quarterly sampling following an SOC greater than the detection limit.</li> </ol>	<p>Ongoing activity, meeting commitment.</p> <p>R5 EOY: Indiana is commended for meeting all commitments for submitting and correcting data during SFY 13.</p>
9.3 – Follow-up on MCL and M/R violations and take an appropriate course of action that ensures public health protection.	Process similar to 7.3 above.	Region 5 will assist as necessary, or as requested.	<p>Ongoing activity, meeting commitment.</p> <p>R5 EOY: The most recent Data Verification and Enforcement Verification concluded that IDEM's performance is satisfactory.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>10.0 – VOCs</b>			
10.1 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system info), and violations for VOCs.  <a href="#">Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</a>	VOC compliance is tracked using SDWIS. To ensure accuracy of treatment and distribution information currently contained in SDWIS, data from sanitary surveys is checked against SDWIS and updated as necessary.		VOCs are tracked under the CDS module of SDWIS.  R5 EOY: Indiana is commended for keeping its data reporting systems up-to-date, thereby facilitating accurate and timely data transfer.
10.2 – Electronically report all VOC MCL, M/R and PN violations and inventory updates to SDWIS/FED for all CWSs and NTNCWSs.	All violations, enforcement and inventory updates are reported to SDWIS quarterly.	Monitor State VOC related follow-up to the findings of the last data verification report, which was:  Ensure that IDEM assigns violations when new systems fail to collect 4 consecutive quarterly samples.	Ongoing activity, meeting commitment.  R5 EOY: Indiana is commended for meeting all commitments for submitting and correcting data during SFY 13.
10.3 – Follow-up on MCL and M/R violations and take an appropriate course of action that ensures public health protection.	Process similar to 7.3 above.	Region 5 will assist as necessary, or as requested.	Ongoing activity, meeting commitment.  R5 EOY: The most recent Enforcement Verification concluded that IDEM’s performance is satisfactory.

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>11.0 – Organic and Inorganic Chemical Monitoring Waiver Program</b>			
<p>11.1 – Any changes to the originally approved waiver program must be submitted to Region 5 for approval.</p> <p><a href="#"><i>Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</i></a></p>	No changes to the approved waiver program have been made to date.		<p>No changes made.</p> <p>R5 EOY: Confirmed</p>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>12.0 – Sodium</b>			
<p>12.1 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for sodium M/Rs.</p> <p><a href="#"><i>Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</i></a></p>	The database for compliance tracking and determination for sodium is part of the IOC database using the CDS module of SDWIS. To ensure accuracy of treatment and distribution information currently contained in SDWIS, data from sanitary surveys is checked against SDWIS and updated as necessary.		<p>Sodium rule is tracked under the CDS module of SDWIS.</p> <p>R5 EOY: Indiana is commended for keeping its data reporting systems up-to-date, thereby facilitating accurate and timely data transfer.</p>
12.2 – Notify appropriate local and State health departments of the sodium levels in CWS drinking water.	All county health departments are provided sodium levels of CWS upon request.		<p>Ongoing activity, meeting commitment.</p> <p>R5 EOY: The most recent Data Verification concluded that IDEM’s performance is satisfactory.</p>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>12.0 – Sodium</b>			
12.3 – Follow-up on M/R violations.	All PWSs with M/R violations are issued a violation letter. The sodium database is part of the CWS IOC database and is tracked as part of that group.	Region 5 will assist as necessary, or as requested.	Ongoing activity, meeting commitment.  R5 EOY: The most recent Enforcement Verification concluded that IDEM's performance is satisfactory.

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>13.0 – Public Notification</b>			
13.1 – Notify all public water systems of their public notification requirements.  <a href="#"><u>Click here to go back to the table of contents (by pressing and holding the "Ctrl" key while clicking the left mouse button).</u></a>	All PWSs have been notified of regulatory requirements.		Complete.  R5 EOY: The most recent Data Verification and Enforcement Verification concluded that IDEM's performance is satisfactory.
13.2 – Maintain a data base management system that accurately tracks PN violations.	The PN violations are tracked under the TCR, CDS, and CCR modules of SDWIS.		PN rule is tracked under the TCR, CDS and CCR modules of SDWIS.  R5 EOY: Indiana is commended for keeping its data reporting systems up-to-date, thereby facilitating accurate and timely data transfer.



Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>13.0 – Public Notification</b>			
13.3 – Electronically report all public notification violations to SDWIS/FED.	All violations, enforcement, and inventory updates are reported to SDWIS quarterly.		Ongoing activity meeting commitment.  R5 EOY: Indiana is commended for meeting all commitments for submitting and correcting data during SFY 13.
13.4 – Follow-up on all Tier 1 violations.	When a system fails to issue a PN under a Tier 1 violation, it is reported as a violation in SDWIS. Both compliance and field staff follow-up on all Tier 1 violations.	Region 5 will assist as necessary, or as requested.	Ongoing activity meeting commitment.  R5 EOY: The most recent Enforcement Verification concluded that IDEM's performance is satisfactory.
13.5 – Follow-up on all Tier 2 and Tier 3 violations.	When a system fails to issue a PN under a Tier 2 or Tier 3 violation, it is reported as a violation in SDWIS. CWSs can report violations as part of their CCR. No additional follow-up will typically be made due to resource limitations.	Region 5 will assist as necessary, or as requested.  R5 to track progress related to state and EPA efforts to obtain additional resources necessary to enable Indiana to follow up on all Tier 2 and Tier 3 violations.	Ongoing activity, meeting commitment.  R5 EOY: The most recent Enforcement Verification concluded that IDEM's performance is satisfactory.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>14.0 – CCR</b>			
14.1 – Notify all regulated water systems of their CCR requirements.  <a href="#">Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</a>	All PWS have been notified of regulatory requirements.	Region 5 has approved an electronic delivery pilot for interested states.	Completed  R5 EOY: The most recent Data Verification concluded that IDEM’s performance is satisfactory.
14.2 – Maintain a data base management system that accurately tracks CCR violations.	A database for CCR is maintained that accurately tracks all CCR violations. CCR is also tracked under the SDWIS compliance schedule module.		CCR is tracked under SDWIS compliance schedule module.  R5 EOY: Indiana is commended for keeping its data reporting systems up-to-date, thereby facilitating accurate and timely data transfer.
14.3 – Electronically report all CCR violations to SDWIS/FED.	All violations, enforcement, and inventory updates are reported to SDWIS quarterly.		Ongoing activity, meeting commitment.  R5 EOY: Indiana is commended for meeting all commitments for submitting and correcting data during SFY 13.
14.4 – Enforce the rule when the water system has not issued a CCR or issued one with insufficient content.	Systems that meet the ERP violation for CCR will be referred to the Enforcement Section for formal enforcement action. If the CCR is not issued as well as the Certification letter, they are identified by the compliance database during July and October of each year respectively. The systems are tracked using SDWIS and issued violation letters.	Region 5 will assist as necessary, or as requested.	Ongoing activity, meeting commitment.  R5 EOY: The most recent Enforcement Verification concluded that IDEM’s performance is satisfactory.



Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>15.0 – Laboratory Certification</b>			
<p>15.1 – All laboratories that produce results for compliance with SDWA are certified by the State to which those results are reported. These certifications shall be done at a frequency of at least once every three years and will meet all requirements of 40 C.F.R. parts 141 and 142. Guidance for these certifications is provided in the EPA <u>Manual for the Certification of Laboratories Analyzing Drinking Water</u>, Fifth Edition. Third parties may be used to conduct the on-site inspections of the laboratories, but the certifications must be issued by an appropriate State official.</p> <p><a href="#">Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</a></p>	<p>IDEM is under a Memorandum of Agreement with the Indiana State Department of Health (ISDH) to issue the Laboratory certification Program for all laboratories performing analyses for compliance with SDWA. ISDH is performing the procedures established in accordance with the Lab Certification guidance manual.</p>		<p>Ongoing activity, meeting commitment.</p> <p>R5 EOY: Region 5 conducted an audit of ISDH in March, 2013. Draft findings were issued on 7/18/13 requesting a response by 9/20/13. A conference call was held on 1/29/14 to discuss the remaining issues with an expected response from ISDH by 2/28/14. The Region expects to issue its certification decision shortly after that. One Regional recommendation is that ISDH and IDEM should update the 1990 MOA and address which Agency will develop a QMP for the Laboratory Certification Program.</p>
<p>15.2 - Ensure that the State has a process to analyze at the Principal State Lab or commercial labs all NPDWR parameters that are required to be sampled in the State.</p>	<p>The Lab Certification process established by ISDH ensures all NPDWR parameters can be analyzed by the State Lab (ISDH) and/or commercial labs.</p>		<p>Meeting commitment performed by ISDH.</p> <p>R5 EOY: Region 5 recently learned that ISDH has established new out-of-State lab fees. Please notify the Region if this has any affect on the State’s capability to analyze NPDWR parameters.</p>



Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>16.0 – Compliance and Enforcement Management</b>			
<p>16.1 – Participate with R5 in compliance and enforcement planning actions including referrals, Enforcement Verification audits, and state compliance and enforcement strategy updates.</p> <p><a href="#"><u>Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</u></a></p>	<p>IDEM’s compliance strategy is current. It is routinely updated to reflect any rule change or policy and/or implementation strategy. IDEM will attend R5 meetings as resources and management priorities allow. If not able to attend in person, IDEM will participate via phone.</p>	<p>Region 5 will complete a final IDEM Enforcement Verification Report during SFY 2013.</p>	<p>Activities consistent with commitment.</p> <p>EPA provided the draft EV report to IDEM in June 2012 and IDEM responded with timely and helpful information in July 2012. The final EV report was sent to IDEM on August 24, 2012.</p> <p>EPA and IDEM should discuss possible updates to the state’s April 11, 2005 Compliance and Enforcement Strategy in light of EPA’s 2009 Enforcement Response Policy.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>16.0 – Compliance and Enforcement Management</b>			
16.2 – The State will conduct compliance assistance and enforcement activities to help prevent systems from becoming ERP priorities and to address or resolve ERP priority systems within six months after being identified as priorities.	The State will send R5 an update on compliance and enforcement activities, within the timeframe requested. Activities to be updated can include: the compliance status of systems using the ERP, ERP Priorities systems, enforcement actions the State has or will be taking to address systems that have not returned to compliance, and any inventory and data corrections. The State will also update SDWIS FED with this information, and link enforcement actions, and/or SOX dates to all violations that are in ERP in its next quarterly submission.	Assist with enforcement referrals, enhanced data exchange, analysis, data clean up, or other joint efforts as requested by state.	Ongoing activity, meeting commitment.  R5 EOY: •EPA focused on nitrate violations at both non-priority and priority systems as part of the quarterly ERP letters. IDEM returned to compliance (RTC) approximately 75 systems. As of the latest data freeze, there are now fewer Indiana systems with Nitrate violations than at the beginning of the State FY.  •IDEM has made School and Daycare systems a priority. They also have fewer violations and approximately 6 schools that have RTC'd.  •IDEM has not referred any systems to EPA.
16.3 – Evaluate compliance with all rules for which the State has primacy. Respond to all violations, provide compliance assistance where appropriate and escalate to formal enforcement where systems have not returned to compliance in a timely way or are not complying with a schedule to return to compliance.	This is an on-going State commitment in order to achieve the best compliance rate for Indiana. DWB has a Capacity Development Team that assist in achieving compliance for recalcitrant systems.	Assist with enforcement referrals, analysis, data clean up, or other joint efforts as requested by state.	Ongoing activity, meeting commitment.  R5 EOY: The most recent Data Verification and Enforcement Verification concluded that IDEM's performance is satisfactory.
16.4 – The State will send R5 an	The State will send R5 an update on	Each quarter, R5 will send the	Ongoing activity, meeting

Table 1. Privacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>16.0 – Compliance and Enforcement Management</b>			
update on compliance and enforcement activities, within the timeframe requested in the quarterly ERP letter.	compliance and enforcement activities, within the timeframe requested in the quarterly ERP letter.	states updated ERP reports requesting a state update. R5 will integrate State updates into reports before the next request is sent out.	commitment.  R5 EOY: IDEM provided timely quarterly updates on priority systems. Indiana is commended for sending timely compliance and enforcement updates every quarter in SFY 13.
16.5 – Electronically report state formal enforcement actions, return to compliance (SOX) dates, and deactivation dates to SDWIS/FED, and correct data errors in SDWIS/FED which result in systems erroneously being classified as priorities based on the ERP. Reporting SOX dates and enforcement actions and ensuring to link to all appropriate violations helps ensure an accurate ERP list.	The State will update SDWIS/FED with this information quarterly, and link ERP addressing enforcement actions, and/or SOX dates to violations as appropriate such that SDWIS/FED accurately represents those actions for each violation affected.		Ongoing activity, meeting commitment.  R5 EOY: Indiana is commended for meeting all commitments for submitting and correcting data during SFY 13.
16.6 – See OECA annual commitment system (ACS) measure (SDWA02) in Attachment A. Commit to address and resolve a specific number of systems between July 2012 and June 2013.	IDEM has committed to fully address and resolve the total number of systems on the July 2012 fixed based list between July 2012 – June 2013.	R5 will track state commitments under measure SDWA02 and update state quarterly, engaging in discussion with states on progress as needed.	Meeting commitment.  R5 EOY: IDEM's 2013 commitment was to address or resolve 85 priority systems. The end of FFY results show that IDEM addressed 119 systems (72 from the original 85 on the fixed base list plus an additional 47 that were more recently >=11).



Table 1. Privacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>17.0 – Data Management and Reporting</b>			
<p>17.1 – State must use the latest version of SDWIS/FedRep to validate and correct errors prior to data submittal. The State must also correct all object errors and as many data quality errors identified by the SDWIS/FED-ODS processing software. These corrections should be submitted before the end of the quarter. Further, States should follow agreed upon protocol (dated 10/5/2006) for transmittal, receipt, and review of output reports by the Region.</p> <p><a href="#">Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</a></p>	<p>For each data submission with errors, the State will contact the Region about their plans for fixing the errors.</p> <p>IDEM-DWB has created and tested the modernized test database and is in production mode since 2005.</p> <p>This is an ongoing process for IDEM-DWB staff since IDEM is fully utilizing all applicable modules of SDWIS 3.01.</p> <p>IDEM will continue to provide error free XML submittals</p>	<p>Provide technical assistance and program assistance to all Region 5 States related to data management.</p>	<p>IDEM has upgraded the SDWIS/FedRep to v3.4. See State commitment.</p> <p>R5 EOY: IDEMs data system is current and up-to-date.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>17.0 – Data Management and Reporting</b>			
17.2 – Continue to improve inventory reporting to SDWIS/FED focusing primarily on inventory data quality errors and improving locational data for CWS intakes, wells, and treatment plants for increased emphasis on Regional emergency response needs.	<p>This is an ongoing process for IDEM-DWB staff since IDEM is fully utilizing all applicable modules of SDWIS 3.01.</p> <p>IDEM will continue collecting treatment plant information thru sanitary survey information and source water lat/long data. Reporting to SDWIS/ODS database will be on-going for the information. Locational data for intakes, wells, treatment plants, and other major system components collected by DWB Field Inspection and Ground Water Sections will be entered into SDWIS.</p>		<p>Meeting commitment.</p> <p>R5 EOY: Indiana is commended for meeting all commitments for submitting and correcting data during SFY 13.</p>
<p>17.3 – Continue to improve the data reliability by the following activities (Data Quality Improvement Plan):</p> <p>17.3.a – IDEM will commit to full automation including electronic reporting from labs and automated monitoring schedule generation and system notification.</p> <p>17.3.b – IDEM will automate the compliance determinations for all rules for which it has primacy.</p> <p>17.3.c – IDEM will update standard operating procedures, as</p>	<p>Since data management is critical to each State's ability to maintain primacy, the State shall send a representative to the annual ASDWA Data Management Users conference.</p> <p>IDEM has upgraded to SDWIS 3.01 since Nov. 2011. IDEM anticipates to move into SDWIS 3.1 by Oct 2012.</p> <p>IDEM will participate in all webinar training offered by EPA on SDWIS.</p> <p>IDEM will work with certified labs in using Lab to State module if the</p>	Region 5 is continuing to develop the NPDWR CDVRT. The LCR CDVRT module is nearly complete. We are working with a contractor to complete the remaining modules.	<p>Meeting commitment. State SDWIS upgrade to v3.1 was completed in March 2013.</p> <p>R5 EOY: IDEMs data system is current and up-to-date.</p>

Table 1. Privacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>17.0 – Data Management and Reporting</b>			
<p>necessary, to ensure proper compliance determinations are being made.</p> <p>17.3.d – IDEM will provide timely compliance determination training to staff, particularly for new rules.</p> <p>17.3.e – IDEM will ensure the accuracy of the service area reporting for school and daycare PWSs and make revisions as necessary.</p> <p>17.3.f - IDEM will correct identified data errors such as violations with compliance period begin dates that are reported after a PWS's deactivation date, etc.</p>	<p>certified lab has capability to submit xml files.</p> <p>IDEM is working with EPA HQ and SAIC in developing rapid data entry application for certified labs submit sample results electronically. The application should be done by end of 2012.</p> <p>SOPs not covered by EPA guidance manual were developed and others are being developed if needed.</p>		

Table 1. Privacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>18.0 – Annual Compliance Report</b>			
<p>18.1 – Prepare and submit an Annual Compliance Report (ACR). Please provide a summary of the number and percentage of systems (by system type) in compliance with monitoring requirements, by rule, as part of this report.</p> <p><a href="#">Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</a></p>	Due Dates: 7/1/12 and 7/1/13	OECA to provide annual ACR guidance. R5 will forward guidance when received.	<p>Completed.</p> <p>R5 EOY: Confirmed</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>19.0 – Conduct Joint Assessment of Program Progress Using Evaluation Tools such as U.S. EPA’s Strategic Plan and State/U.S. EPA Shared Goals</b>			
<p>19.1 – Gather information to track strategic plan progress.</p> <p>State directors will attend the annual Region 5 state directors meeting in April 2013 to discuss primacy and implementation issues.</p> <p><a href="#">Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</a></p>	<p>IDEM will report on status of it’s commitments for measures in U.S. EPA’s strategic plan.</p>	<p>Compile information and report to HQ.</p> <p>Annually assess each State’s progress in attaining the shared goals milestones, and identify U.S. EPA or State follow-up actions needed to maintain or improve compliance. Negotiate appropriate disinvestments with States as necessary to ensure that the highest priority work is done. Work with State Drinking Water and Ground Water Programs to increase public understanding of the impacts of budget cuts on public health protection efforts, and assist in state efforts to gain additional program resources.</p> <p>R5 will schedule semi-annual conference calls about every six months to discuss status updates and issues regarding state-specific topics.</p>	<p>DWB has participated and provided input and commitments on the Strategic Plans and Shared Goals with Region 5 States.</p> <p>R5 EOY: Confirmed</p>

Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Preparing for Security Threats at PWSs</b>			
1.1 – The state has adopted and can implement an adequate plan for the provision of safe drinking water under emergency circumstances including, but not limited to, earthquakes, floods, hurricanes, and other natural disasters.	<p>Report work plan progress semi-annually.</p> <p>Participate in monthly calls as scheduled by U.S. EPA.</p> <p>Participate in quarterly conference calls with state security contacts.</p> <p>The State has developed a template, available to all systems, for emergency planning and response for provision of water during emergencies. System plans will be reviewed during sanitary surveys.</p>	Review state emergency water plans and consult with the state on implementation capabilities.	<p>Commitment being met. Progress reports submitted as required. Emergency plans are reviewed during sanitary surveys. Staff participates in monthly and quarterly calls. A series of roundtable meetings with systems were held at 4 locations around the state at the request of Region 5.</p> <p>R5 EOY: Confirmed</p>

Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>2.0 – Operator Certification</b>			
<p>2.1 – Annually provide documentation to U.S. EPA showing the ongoing implementation of the Operator Certification Program to avoid 20% withholding of the DWSRF capitalization grant.</p> <p>Due Dates – September 30, 2012 and September 30, 2013</p> <p><a href="#">Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</a></p>	<p>This is an ongoing activity to achieve qualified operators in charge of Indiana’s water systems. IDEM will submit an Annual Report to demonstrate implementation of the Program</p>	<p>Coordinate information and issues on Op Cert Program implementation and review and approve annual reports.</p>	<p>Commitment being met. Two exam days scheduled per year with expanded sites for each exam.</p> <p>R5 EOY: Commitment met.</p>

Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>2.0 – Operator Certification</b>			
2.2 – For operators of CWSs and NTNCWSs: (1) provide training and certification opportunities for new operators, and (2) provide training and opportunities for upgrading and renewing certification for existing operators.	This is an ongoing activity for IDEM staff to provide training to new and existing operators. IDEM staff maintains data on the training received by operators on a continuing basis. Staff also approves training from other sources for operator continuing education.		<p>Commitment being met. Provide operators with information on classes by various groups around the state to maintain CEUs and obtain training. Also train and certify Facility Specific Operators.</p> <p>R5 EOY: Confirmed. EPA recommends that IDEM continue efforts to ensure that water treatment operators maintain a strong focus on Asset Management, encourage water systems to take advantage of the VA's offerings that will benefit returning veterans and water systems, and ensure that RTCR implementation of the Level 1 and Level 2 assessments is consistent throughout the State.</p>



Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>2.0 – Operator Certification</b>			
2.3 – Provide supplemental certification and training to water system operators on relevant “Sustainable Water Infrastructure” topics from section 1.0 of the “EPA national and regional priorities” table of the ARDP to ensure sustainable water utilities and water supplies. For example, conduct CEU-eligible training to water operators on supply/demand water efficiency or add supplemental questions on treatment plant energy efficiency activities to certification exams.	IDEM staff attend workshops and/or webcasts on Sustainable Water Infrastructure topics in order to provide this information to water system operators. Training is ongoing throughout the year via trade organizations conferences. Operator Certification staff work continually with exam providers to include questions regarding treatment plan energy efficient activities and supply/demand water efficiency.	Region 5 sustainable water infrastructure (SWI) workgroup will provide training and outreach materials to water system operators and technical assistance providers, in coordination with states.	Commitment being met with various training opportunities via many organizations and IDEM staff.  R5 EOY: Confirmed

Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>3.0 – Capacity Development</b>			
<p>3.1 – Annually provide documentation to U.S. EPA showing the ongoing implementation of both the new systems program and the existing systems strategy to avoid 20% withholding of the DWSRF capitalization grant. Annual report should address the new Capacity Development reporting measures.</p> <p>Due Dates – December 31, 2012 and December 31, 2013.</p> <p><a href="#">Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</a></p>	IDEM will provide the Annual report on new systems programs and existing systems strategy by the deadline each year.	Region 5 will send a reminder to the State about the capacity development annual report in August 2012 and August 2013.	<p>Commitment being met by submitting timely annual reports to EPA.</p> <p>R5 EOY: Confirmed</p>

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>3.0 – Capacity Development</b>			
3.2 – Promote “Sustainable Water Infrastructure” activities as described in section 1.0 of the “national and regional EPA priorities” table of the ARDP in Capacity Development activities and assessments as part of improving the capacity and sustainability of water systems and water supplies. For example, provide technical assistance on starting an asset management program or conduct energy audits for treatment plants.	These activities are ongoing with the Capacity Development staff. Training is achieved by onsite visits as well as email and phone communications. This is especially emphasized with new water systems.	Region 5 SWI workgroup will provide training and outreach materials and assistance on tools (i.e., Check Up Program for Small Systems (CUPSS)) to water system operators and technical assistance providers, in coordination with states.	Commitment being met by providing technical assistance on asset management.  R5 EOY: Confirmed

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>4.0 – Source Water Assessments and Protection</b>			
4.1 – Update source water assessments, as resources allow.  <a href="#"><i>Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</i></a>	Source water assessments will be updated as resources allow.		Ongoing activities, met commitment.  R5 EOY: Confirmed

Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>4.0 – Source Water Assessments and Protection</b>			
4.2 – Assist local community source water protection (SWP) plan preparation and implementation in cooperation with Source Water Collaborative (SWC) members (e.g., National Rural Water Association, American Planning Association, and others).	SWP plan development and implementation will be achieved with assistance from the following SWC partners: Alliance of Indiana Rural Water, Indiana Association of Soil and Water Conservation Districts and local USDA Offices.	<p>Continue to develop tools as needed, foster cross-program coordination, and encourage coordination with SWC partners to encourage broad-based actions at the state and local levels to address potential sources of contamination.</p> <p>Facilitate the development and expansion of State-SWC partnerships. Provide feedback and guidance.</p> <p>Encourage interstate communication through conference calls and an annual State–R5 EPA meeting.</p>	Ongoing activities, met commitment.

Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>4.0 – Source Water Assessments and Protection</b>			
<p>4.3 – Report the number of CWSs with SWP plans and the number of CWSs implementing SWP measures (electronically via SDWIS, if possible).</p> <p>For states that do not report via SDWIS, R5 requests that States voluntarily provide a list of system names and/or PWSID numbers that have SWP plans in place and a list of system names and/or PWSID numbers that are substantially implementing SWP as defined by the State as of the end of FY 2012 on June 30, 2012 by August 15, 2012.</p>	<p>DWB will provide the number of CWSs with SWP plans and the number of CWSs implementing SWP measures that are substantially implementing SWP as defined by IDEM/Indiana as of the end of FY 2013 on June 30, 2013 by August 15, 2013 via SDWIS reporting.</p>	<p>Maintain and update State information in the Region 5 portion of the annual SWP report to EPA-HQ.</p>	<p>Completed: Reporting of the number of CWSs with SWP plans and the number of CWSs implementing SWP measures were done electronically via SDWIS, met commitment.</p> <p>R5 EOY: Confirmed</p>

Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>4.0 – Source Water Assessments and Protection</b>			
<p>4.4 – Develop and implement coordinated approaches with other regulatory and voluntary programs to protect both the quality and quantity of source water, particularly in areas of concern.</p>	<p>DWB will work with the Clean Water Act (CWA) Program to facilitate assessment and protection of surface waters with a Public Water Supply (PWS) use.</p> <p>Work with CWA entities to prioritize impaired waters with PWS impairments to increase TMDL or other pollution control plan development.</p> <p>Work with CWA entities to identify PWS impaired waters in which TMDL or other pollution control plan implementation is occurring and encourage follow-up monitoring assessment which could document restoration.</p> <p>Work with other media programs to develop and implement tailored approaches that will achieve substantial implementation of source water protection.</p>	<p>Provide training, technical assistance, and technology transfer capabilities.</p> <p>Facilitate the adoption and sharing of Geographic Information System databases to support local decision making.</p> <p>Work with Clean Water Act program to encourage assessment of surface waters for drinking water use, prioritize impaired waters, develop TMDLs, and develop tailored approaches to achieve substantial implementation.</p> <p>Enhance SWP integration elements like the watershed approach, stormwater management, and prioritized enforcement inspections based on SWP.</p> <p>Work with the state to characterize current and future pressures on source water quality and availability. Support voluntary programs such as WaterSense and other Sustainable Infrastructure activities to protect water resources.</p>	<p>Ongoing activities, met commitment.</p> <p>R5 EOY: Confirmed. During 2013 R5 reviewed and commented on the following CWA documents:</p> <p>IN 2013-2018 state NPS management plan (August 2013)</p> <p>IN nutrient reduction strategy (September 2013)</p>

Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>4.0 – Source Water Assessments and Protection</b>			
4.5 – Develop and expand SWP program implementation mechanisms, where possible.	IDEM will expand the Hoosier Water Guardian program to include PWS's utilizing surface water as their source of drinking water.	Promote the innovative use of DWSRF set-asides and other potential program funding streams.	<p>Due to leadership staff turnover and subsequent loss of the leadership staff position responsible for administering and promoting the Hoosier Water Guardian program, expanding the program to include PWS utilizing surface water as their source of drinking water has not been developed. The DWB will continue to pursue expansion of the Hoosier Water Guardian in the future as staff resources allow.</p> <p>R5 EOY: R5 understands State limitations related to obtaining additional resources.</p>

Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>5.0 – Conduct Joint Assessment of Program Progress Using the PWSS Program Implementation Report</b>			
<p>5.1 – Review the draft report prepared by R5 and assist in filling gaps related to the State’s PWSS program to support the various components of the PWSS program implementation logic model.</p> <p><a href="#"><i>Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</i></a></p>	<p>IDEM will review the draft report prepared by R5. IDEM will assist with addressing gaps related to the PWSS program. However, IDEM may not have ability to address any items that require additional resources.</p>	<p>Use the logic model to improve our ability to understand, measure, assess, and communicate progress.</p> <p>SPM will work with state program to determine state-specific approach, and schedule.</p>	<p>Ongoing activity.</p> <p>R5 EOY: Confirmed</p>



Table 3. National and Regional EPA Priorities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Sustainable Infrastructure</b>			
<p>1.1 – Enable water system and water supply sustainability by providing incentives through DWSRF set-asides and grant criteria, providing training, and encouraging sustainable water infrastructure (SWI) activities including, for example, those related to water and/or energy efficiency, asset management, and climate change adaptation and mitigation activities. SWI is important to the success of other activities in this work plan, including source water protection, DWSRF, operator certification, capacity development, and all-hazards resilience approaches, etc.</p> <p><a href="#">Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</a></p>	<p>The Indiana State Revolving Fund (SRF) Loan Program has a sustainability incentive for communities to include “green” project components in their SRF projects. Green projects include sustainable green infrastructure, water or energy efficiency measures or are environmentally innovative solutions. Based on the type and cost of the green component, a community may be eligible for improved ranking on the SRF Project Priority List as well as an interest rate break up to 0.5 % on its SRF Loan.</p>	<p>Region 5 staff participate in a region-wide SWI workgroup created to develop and share information about the cost savings and benefits of investments in SWI initiatives, including WaterSense.</p> <p>Region 5 staff participate in regional and national EPA climate change adaptation/mitigation workgroups that share information about ongoing initiatives.</p> <p>R5 to contact states to identify what, if any, sustainable water infrastructure/climate change efforts are a priority.</p>	<p>Met commitment.</p> <p>R5 EOY: Confirmed</p>

Table 3. National and Regional EPA Priorities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>2.0 – Environmental Justice</b>			
<p>2.1 Provide incentives through DWSRF set-asides and grant criteria or otherwise promote and encourage environmental justice.</p> <p><a href="#">Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</a></p>	<p>The Indiana Drinking Water State Revolving Fund (SRF) Loan Program gives priority to lower income and smaller population-served communities on its Drinking Water SRF Project Priority List. In addition, the Indiana Drinking Water SRF Loan Program provides additional subsidy, in the form of principle forgiveness, to eligible communities with high post-project user rates. The Indiana SRF Loan Program accepts public comment on its Intended Use Plans, Project Priority Lists, and environmental review documents. Current documents may be viewed at <a href="http://www.srf.in.gov">www.srf.in.gov</a>.</p>	<p>R5 has the capability to provide states with draft GIS maps that show areas with environmental justice concerns—currently through the Environmental Justice Strategic Enforcement Assessment Tool (EJSEAT) and eventually through other tools as an interim screening approach.</p>	<p>Met commitment.</p> <p>R5 EOY: Confirmed</p>

## Attachment A: Linking the Strategic Plan to this Work Plan

This continuing program grant is consistent with U.S. EPA’s Strategic Plan Goal 2: Clean and Safe Water, which calls for protecting public health by providing safe drinking water. Many of the grant work plan activities contribute to the goal of assuring that people served by public water systems receive drinking water that meets all applicable standards through effective treatment and source water protection. Continuing program implementation includes adopting rules at least as stringent as federal regulations, providing assistance to public water systems on regulatory requirements, conducting sanitary surveys, ensuring that monitoring and follow-up is conducted, and enforcing regulations.

**Table A. Final FY 2013 National Water Program Guidance:  
OW and OECA National Program Manager (NPM) Guidance Targets and Program Activity Measures<sup>1</sup>**

OW ACS code	Goal 2: Clean and Safe Water Subobjective 2.1.1: Water Safe to Drink
SDW-211	By FY2013, 92 percent of the population served by CWSs will receive drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection. State FY13 target: 94%. EOY: 98.7% <b>Target Met</b>
SDW-SP1.N11	By FY2013, 90 percent of the CWSs will meet all applicable health-based standards through approaches that include effective treatment and source water protection. State FY13 target: 93% EOY: 94.2% <b>Target Met</b>
SDW-SP2	By FY2013, CWSs will provide drinking water that meets all applicable health-based drinking water standards during 95 percent of “person months” (i.e., all persons served by CWSs times 12 months). State FY13 target: 96%. EOY: 99.7% <b>Target Met</b>
SDW-SP4a	By FY2013, minimize risk to public health through source water protection for 50 percent of CWSs (i.e., “minimized risk” achieved by substantial implementation, as determined by the state, of actions in a source water protection strategy). State FY13 target: 88%. EOY: 88% <b>Target Met</b>
SDW-SP4b	By FY2013, minimize risk to public health through source water protection for 57 percent of the population served by CWSs (i.e., “minimized risk” achieved by substantial implementation, as determined by the state, of actions in a source water protection strategy). State FY13 target: 75%. EOY: 76%. <b>Target Met</b>
SDW-01a	By FY2013, 95 percent of CWSs that have undergone a sanitary survey within the past three years (five years for outstanding performers) as required under the Interim Enhanced and Long-Term 1 Surface Water Treatment Rules. State FY13 target: 100%. EOY: 98.2% <b>Target Not Met</b>
SDW-04	In FY2013, achieve a 89 percent fund utilization rate [cumulative dollar amount of loan agreements divided by cumulative funds available for projects] for the Drinking Water State Revolving Fund (DWSRF).
SDW-05	The number of DWSRF projects that have initiated operations (cumulative).
SDW-11	Percent of DWSRF projects awarded to small PWSs serving <500, 501-3,300, and 3,301-10,000 consumers. <b>This is an indicator that HQ reports. EOY: 71%</b>
SDW-15	Number and percent of small CWSs and NTNCWSs (<500, 501-3,300, 3,301-10,000) with repeat health-based Nitrate/Nitrite,

	Stage 1 D/DBP, SWTR and TCR violations. <b>This is an indicator that HQ reports.</b>
SDW-17	Number and percent of schools and childcare centers that meet all health-based drinking water standards. <b>This is an indicator that HQ reports.</b>

OECA ACS code	<b>Goal 5: Compliance and Environmental Stewardship</b> <b>Subobjective 5.1.2: Address Environmental Problems from Water Pollution</b>
SDWA02	During FY2013, the primacy agency must address with a formal enforcement action or return to compliance the number of priority systems equal to the number of its PWSs that have a score of 11 or higher on the July 2013 ETT report <sup>2</sup> . <i>EOY: IDEM's 2013 commitment was to address or resolve 85 priority systems. The end of FFY results show that IDEM addressed 119 systems (72 from the original 85 on the fixed base list plus an additional 47 that were more recently <math>\geq 11</math>). Indiana is commended for this accomplishment.</i>
Agency priority goal	<b>EPA Small Systems Priority Goal (FY12-13)</b> <b>Strengthening State Program Capacity to Improve Public Water System Sustainability</b>
Protecting America's waters	Improve public health protection for persons served by small drinking water systems by strengthening the technical, managerial and financial capacity of those systems. By September 30, 2013, EPA will engage with twenty states to improve small drinking water system capability through two EPA programs, the optimization program and/or the capacity development program.

<sup>1</sup> The information in Table A is based on draft FY2013 OW and OECA measures at <http://www.epa.gov/planandbudget/annualplan/FY13OWFinalNPMGuidance.pdf> (see Appendix A, pages 83 and 84) and <http://www.epa.gov/planandbudget/annualplan/FY13OECAFinalNPMGuidance.pdf> (see pages 48 and 94), respectively. The EPA small systems priority goal is mentioned on page 17 of the above mentioned OW NPM guidance and in the February 2012 Addendum to the FY 2011-2015 Strategic Plan at <http://www.epa.gov/planandbudget/strategicplan.html>.

<sup>2</sup> A primacy agency's success at addressing violations will be tracked by means of the quarterly ETT reports. Numerical targets may be adjusted at mid-year. While it remains the ERP's goal that all of a priority system's violations will be returned to compliance, a primacy agency has met its commitment under the 2013 SDWA ACS with respect to a priority system if the score for that system has been brought below, and remains below, eleven.